

EXHIBIT E

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SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF SAN FRANCISCO – UNLIMITED JURISDICTION

Coordination Proceeding

In Re: Uber Rideshare Cases

This Document Relates to:

ALL ACTIONS

JUDICIAL COUNCIL COORDINATION
PROCEEDING NO. 5188

Case No. CJC-21-005188

(Assigned to Hon. Ethan P. Schulman, Dept. 304)

**STIPULATION RE: CASE MANAGEMENT
ISSUES IN JCCP NO. 5188 ; ORDER**

FILED
San Francisco County Superior Court

AUG 25 2023

CLERK OF THE COURT
BY: *[Signature]* Deputy Clerk

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STIPULATION

This Stipulation is entered by and among Plaintiffs and Defendants Uber Technologies, Inc., Rasier, LLC, and Rasier-CA, LLC (“Defendants,” and collectively with Plaintiffs, the “Parties”), through the court-appointed Plaintiffs’ Co-Lead Counsel.

WHEREAS, in an order entered on January 23, 2023 (the “FNC Order”), the Court granted Uber’s motions to stay or dismiss *Jane Doe LSA 35 v. Uber Techs., Inc., et al.*, CGC-21-592274 based on *forum non conveniens*;

WHEREAS, in an order entered on February 28, 2023 (the “February 28 Stipulated Order”), the Court ordered the FNC Order to apply to a list of the cases in this coordinated proceeding that arise from alleged incidents that occurred outside of California (“Non-California Cases”);

WHEREAS, the Plaintiffs have filed notices of appeal from the FNC Order and the February 28 Stipulated Order (the “FNC Appeals”);

WHEREAS, the Parties have agreed upon forms of the Model Plaintiff Fact Sheet and Model Defense Fact Sheet;

WHEREAS, Defendants’ deadline to file an answer with respect to Plaintiffs’ Amended Long-Form Complaint is currently August 23, 2023.

NOW, THEREFORE, IT IS AGREED AND STIPULATED BY THE PARTIES THAT:

1. Any cases involving an allegation of sexual assault or sexual misconduct occurring outside of California (“Non-California Cases”), which are ordered added to the JCCP after February 28, 2023, are deemed stayed upon entry of an order of coordination into this coordinated proceeding; provided, however, that within 15 days after resolution of the FNC Appeals in the Court of Appeal (the “Appellate Ruling”), the parties in such cases shall meet and confer to discuss a process for stipulating to or contesting the applicability of the Appellate Ruling to the Non-California Cases.

2. In any case involving an allegation of sexual assault or sexual misconduct occurring inside of California (“California Cases”), which is ordered added to the JCCP after

February 28, 2023, each Plaintiff shall complete and serve a verified fact sheet providing information requested in the Model Plaintiff Fact Sheet no later than 60 days from the date of the relevant order of coordination. Uber shall complete and serve a verified Model Defense Fact Sheet as to each Plaintiff no later than 120 days from the date of the relevant order of coordination.

3. The Parties have also agreed that Plaintiffs do not need to file each individual fact sheet with the Court. In lieu of this, Plaintiffs agree to serve the Plaintiff Fact sheets upon Uber. Plaintiffs also agree to file a pleading with the Court, by September 30, 2023, identifying the cases wherein fact sheets have been served and the date on which they were served. This pleading will be amended every three months to include newly served Plaintiff Fact Sheets. Defendants will also file an analogous pleading with the Court identifying the cases wherein Defense Fact Sheets have been served and the date on which they were served, by November 30, 2023, which will also be amended and updated every three months.

4. Defendants' deadline to file an answer with respect to Plaintiffs' Amended Long-Form Complaint shall be extended to September 6, 2023.

DATED: August 23, 2023

LEVIN SIMES LLP

By: /s/ William A. Levin

WILLIAM A. LEVIN
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DAVID M. GRIMES

Co-Lead Counsel for Plaintiffs

DATED: August 23, 2023

WILLIAMS HART & BOUNDAS, LLP

By: /s/ John Boundas

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1 DATED: August 23, 2023

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4 KRISTEN BARTON

Co-Lead Counsel for Plaintiff

5 DATED: August 23, 2023

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7 By: /s/ Celine E. Cutter

8 CELINE E. CUTTER

9 *Liaison Counsel for Plaintiffs*

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11 DATED: August 23, 2023

**PAUL, WEISS, RIFKIND, WHARTON &
GARRISON LLP**

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15 By: /s/ Robert Atkins

16 ROBERT ATKINS

17 *ATTORNEYS FOR DEFENDANTS*
18 *UBER TECHNOLOGIES, INC.,*
19 *RASIER, LLC AND RASIER-CA, LLC*

PROPOSED ORDER

IT IS HEREBY ORDERED:

1. This Order shall be binding on all Plaintiffs whose claims are hereafter coordinated into this coordination proceeding.

2. Accordingly, Non-California Cases which are added to the JCCP after February 28, 2023, are deemed stayed upon entry of an order of coordination into this coordinated proceeding; provided, however, that within 15 days after resolution of the FNC Appeals in the Court of Appeal (the "Appellate Ruling"), the parties in such cases shall meet and confer to discuss a process for stipulating to or contesting the applicability of the Appellate Ruling to the Non-California Cases.

3. With respect to any California cases which are added to the JCCP after February 28, 2023, each Plaintiff shall complete and serve a verified fact sheet providing information requested in the Model Plaintiff Fact Sheet no later than 60 days from the date of the relevant order of coordination. Uber shall complete and serve a verified Model Defense Fact Sheet as to each Plaintiff no later than 120 days from the date of the relevant order of coordination.

4. The Parties have also agreed that Plaintiffs do not need to file each individual fact sheet with the Court. In lieu of this, Plaintiffs agree to file a pleading with the Court identifying the cases wherein fact sheets have been served by September 30, 2023. This pleading will be amended every three months to include newly served Plaintiff Fact Sheets. Defendants will also file an equivalent pleading with the Court identifying the cases wherein Defense Fact Sheets have been served by November 30, 2023, which will also be amended every three months.


5. Defendants' deadline to file an answer to Plaintiffs' Amended Long-Form Complaint shall be extended to September 6, 2023.

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1 **IT IS SO ORDERED.**

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3 DATED: Aug. 25, 2023

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5 THE HONORABLE ETHAN P. SCHULMAN
6 JUDGE OF THE SUPERIOR COURT FOR THE
7 COUNTY OF SAN FRANCISCO